

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Avenue • Suite 2458 • New York, New York 10170
T: 212.792.0046 • E: Joshua@levinestein.com

March 25, 2025

Via Electronic Filing

The Hon. Magistrate Judge Steven I. Locke
U.S. District Court, Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Hernandez et al v. Rosso Uptown, Ltd. et al
Case No.: 2:20-cv-04026

Dear Honorable Judge Locke:

This law firm represents Defendants Rosso Uptown, Ltd. (the “Corporate Defendant”), Michael Tizzano and Massimo Gammella (together, the “Individual Defendants”, and collectively with the Corporate Defendant, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 3(C), and the directives contained in the Court’s January 27, 2025 Order, this letter respectfully serves to schedule a settlement conference, at the Court’s earliest availability. This is a joint request made with the consent of the Plaintiffs Santos Hernandez and Emmanuel De Jesus Lievano.

Pursuant to Your Honor’s Individual Motion Practice Rule 3(C), the Plaintiffs and the Defendants are available on the following dates: March 31, 2025, April 2, 2025, and April 4, 2025.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua Levin-Epstein
Joshua Levin-Epstein, Esq.
420 Lexington Avenue, Suite 2458
New York, New York 10170
Tel. No.: (212) 792-0046
Email: Joshua@levinestein.com
Attorneys for Defendants